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MEMO ENDORSED

Via ECF

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October 28, 2021

Honorable Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Shanghai Shuoxin International Co., Ltd. v. Jordache Enterprises Inc.*
(1:21-cv-05825-VEC)

Dear Judge Caproni:

We represent defendant Jordache Enterprises, Inc. ("Jordache") in the above-referenced action. This letter is submitted jointly with counsel for plaintiff Shanghai Shouxin International Co. Ltd. ("SSI"). Pursuant to Rule 2(C) of Your Honor's Individual Practices, the parties respectfully request an adjournment of the Initial Pretrial Conference, currently scheduled for November 5, 2021 at 3:00 p.m. The parties make this request to allow the parties to continue to focus on settlement efforts at this time.

As we reported in our September 30, 2021 letter to Your Honor (ECF Doc. 16), the parties are working to reach an amicable resolution to this matter before incurring substantial legal fees and costs in connection with amended pleadings and discovery. Since our last update, SSI has provided information on its claimed damages, and Jordache has requested certain additional information, which SSI has agreed to provide. The parties are also arranging a physical inspection of the materials in inventory at SSI's warehouse in China. In light of these ongoing settlement efforts, we respectfully request an adjournment of the Initial Pretrial Conference, currently scheduled for November 5, 2021 at 3:00 p.m., and the corresponding deadline to submit a joint proposed Case Management Plan and joint letter setting forth the factual and legal bases of claims and defenses. We respectfully propose that the Initial Pretrial Conference be adjourned to Friday, December 3, 2021 or December 10, 2021. This is the third request for an adjournment of the conference.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Sara J. Crisafulli'.

Sara J. Crisafulli

cc: All Counsel of Record (via ECF)

Application GRANTED. The Initial Pretrial Conference currently scheduled for November 5, 2021, at 2:00 p.m. is hereby ADJOURNED until December 10, 2021, at 1:00 p.m. Pre-conference submissions are due no later than Thursday, December 2, 2021. For a description of the pre-conference submissions requirements, the parties should consult the Court's order at docket entry 7.

The Initial Pretrial Conference will be held telephonically. All parties and any interested members of the public must attend by dialing 1-888-363-4749, using the access code 3121171, and the security code 5825. All attendees are advised to mute their phones when not speaking and to self-identify each time they speak. Recording or rebroadcasting the proceeding is strictly prohibited by law.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

10/28/21

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE